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Attorneys for Defendants Kaiser Aluminum
Washington, LLC and Kaiser Aluminum
Fabricated Products, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MICHELLE ANDERSON, an individual,

Plaintiff,

vs.

No.

AFFIDAVIT OF PATRICK J. CRONIN
IN SUPPORT OF NOTICE OF
REMOVAL

KAISER ALUMINUM WASHINGTON,
LLC, a foreign corporation doing business
in the State of Washington; KAISER
ALUMINUM FABRICATED
PRODUCTS, LLC, a foreign corporation
doing business in the State of Washington;
"JOHN DOE I-V" employees, agents,
and/or independent contractors of KAISER
ALUMINUM WASHINGTON, LLC
and/or KAISER ALUMINUM
FABRICATED PRODUCTS, LLC; and

"UNKNOWN BUSINESS ENTITIES I-
V", jointly and severally,
Defendants.

STATE OF WASHINGTON)
: ss.
COUNTY OF SPOKANE)

PATRICK J. CRONIN, being first duly sworn, upon oath deposes and says:

1. I represent the defendants Kaiser Aluminum Washington, LLC and
Kaiser Aluminum Fabricated Products, LLC in this action.

2. I have reviewed the Complaint filed by the plaintiff, which includes a
claim for damages for injuries suffered by the plaintiff, as well as prejudgment
interest, attorney fees, and costs.

3. Plaintiff's counsel has stated in writing that plaintiff Michelle
Anderson's claim for damages exceeds \$2 million.



PATRICK J. CRONIN

SUBSCRIBED AND SWORN to before me this 1st day of June, 2021.



NOTARY PUBLIC in and for the State
of Washington, residing at Spokane Valley
My commission expires: 5-1-23

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2021, I caused the foregoing to be served on the following parties in the manner indicated:

Matthew F. Duggan
GLP Attorneys, P.S., Inc.
601 W. Main Ave., Suite 305
Spokane, WA 99201

Attorney for Plaintiff

VIA REGULAR MAIL
VIA CERTIFIED MAIL
HAND DELIVERED
BY FACSIMILE
VIA EMAIL

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s/Patrick J. Cronin

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